

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

Danielle Miller

Case No. 21-mj-5198-JGD

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 1, 2020 in the county of Suffolk in the
District of Massachusetts, the defendant(s) violated:

Code Section

18 U.S.C. § 1343

Offense Description

Wire fraud, that is, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing the scheme to defraud – specifically, by accessing a myRMV account maintained by the Massachusetts Registry of Motor Vehicles.

This criminal complaint is based on these facts:

Please see the affidavit of Special Agent Jacqueen Cunningham, Homeland Security Investigations, which is attached hereto and incorporated by reference.

☒ Continued on the attached sheet.


Complainant's signature

Jacqueen Cunningham, Special Agent, HSI

Printed name and title

Sworn to by telephone pursuant to Fed. R. Crim. P. 4.1.

Date: 05/10/2021


Judge's signature

City and state: Boston, MA

Hon. Judith G. Dein, U.S. Magistrate Judge

Printed name and title